

Exhibit E

DECLARATION OF MATTHEW S. EDELSTEIN PURSUANT TO 28 U.S.C. § 1746

I, Matthew S. Edelstein, hereby make the following declaration based upon my personal knowledge:

1. I am employed as an Investigator by the Commodity Futures Trading Commission (the “Commission”) in the Division of Enforcement (“the Division”).

2. My primary responsibilities include conducting investigations to determine whether there have been violations of the Commodity Exchange Act and Commission Regulations. In connection with these responsibilities, I analyze bank records, documents related to trading, account opening documents, and customer records for commodity futures, commodity options, swaps, off-exchange foreign currency accounts and digital asset accounts; trace the flow of funds through bank, commodity futures, commodity options, foreign currency, and digital asset trading accounts; review corporate formation documents filed with various state and federal agencies; and, review applicable registration information for entities and individuals in the U.S. futures industry, among other activities.

3. I have worked for the Commission since July 2019. Prior to joining the Commission, I held the position of senior trader at International Trading Group, LLC, and then HC Technologies, LLC, from 2003-2017. I received a Bachelor of Arts degree in Economics from Northwestern University in 2002.

I. SCOPE OF INVESTIGATION

4. From July 2022 to the present, I have participated in an investigation initiated by the Division involving Murtuza Kazmi (“Kazmi”), My Forex Funds (“MFF”), and Traders Global Group, Inc. (“TGG”).

5. I have personal knowledge of the facts set forth herein based on my participation in the investigation, including among other things, my review of documents obtained by the Division. During the course of the investigation, I have, among other things

- a. Obtained and reviewed account agreements, account statements and other documents associated with the bank account maintained by TGG;
- b. Obtained and reviewed account agreements, account statements and other documents associated with the bank account maintained by Kazmi;
- c. Obtained and reviewed account agreements, account statements and other documents associated with the digital asset accounts maintained by Kazmi and TGG;
- d. Obtained and reviewed account agreements, account statements and other documents associated with the payroll processing service utilized by TGG;
- e. Obtained and reviewed contracts, trade reports, and correspondence associated with the clientele of TGG;
- f. Interviewed employees of iS Risk Analytics, Inc., a technology and risk management consulting firm utilized by TGG;
- g. Completed various internet and computer database searches for information regarding Kazmi, MFF, and TGG;

- h. Reviewed the MFF website and other publicly available sources of information for Kazmi, MFF, and TGG.

II. TRADING ACCOUNTS

6. In August 2022, the Division sent requests to all registered Futures Commission Merchants (“FCMs”) and registered Retail Foreign Exchange Dealers (“RFEDs”) seeking information related to any commodity futures or forex trading accounts in the name of, and/or controlled by, Kazmi, TGG or MFF.

7. Based on responses to the aforementioned requests, neither Kazmi, TGG, nor MFF have opened a trading account for the purpose of trading futures or forex.

III. IS RISK ANALYTICS

8. I reviewed documents obtained via subpoena from iSRisk Analytics, Inc., (“iSRisk”) concerning the company’s business relationship with Kazmi, Dentrinos, TGG, and MFF. The documents included, among other items, various files from database servers that iS Risk leased to Traders Global.

9. These database servers capture and store data relating to trading of leveraged forex and retail commodity contracts by customers of Traders Global. The data, reflected in the files produced by Traders Global, includes registration information for customers, information relating to the manner in which customers’ trading orders were routed and executed, and information relating to the manner in which commissions and fees were charged to customers’ accounts. The files cover the period of November 1, 2021, the approximate date when Traders Global first

started using iS Risk's services, through October 14, 2022, the date of iS Risk's production and the most recent record in the Division's file.

10. The files produced by iS Risk are voluminous, and cannot be conveniently examined in court. The aggregate size of the files is in excess of 90 gigabytes. There are in excess of 23,000 files. Accordingly, I performed certain calculations to reduce these records to accurate summaries relevant to various aspects of the case.

11. The files reflect that approximately 135,000 unique customers opened accounts with Traders Global. I determined this by analyzing the data contained in "user" files produced by iS Risk that contain customer registration information. In order to conduct this analysis, I wrote a computer program that parsed the user files and tallied the unique customer names contained within each file.

12. The files produced by iS Risk include trade data, i.e., orders and executions, for Traders Global customers. These files reflect that some of the Traders Global customers were assigned to so-called "demo" servers. Other Traders Global customers were assigned to so-called "live" servers. iS Risk employee Matthew Chichester explained in investigative testimony that the demo servers are for Traders Global customers who need to take a trading "test." (Ex. D, Chichester Test. 36:16 through 37:9.) Customers who pass the test graduate to the live servers. (Id.)

13. The files produced by iS Risk reflect that Traders Global assessed in excess of \$7,000,000 in "commission" charges against customer trades in accounts

trading on the “live” servers. I determined this by analyzing the data contained in the “customer trades” files. In order to conduct this analysis, I wrote a computer program that parsed the customer trades files and accurately summed the values found in the field labeled “Commissions.”

14. The files reflect that over 99% of accounts on the live servers had their trading orders intentionally modified by Traders Global to delay execution times and worsen execution prices, i.e., “slippage”. I determined this by analyzing the data contained in the “risk profile” and “user risk assignment” files. In order to conduct this analysis, I wrote a computer program that parsed the risk profile and user risk assignment files and accurately tallied the risk profiles assigned to customers. The risk profiles contain fields and associated values that indicate whether and to what extent trading orders will be delayed and whether execution prices will be modified to the detriment of the customer. The user risk assignments show the accounts assigned to each risk profile.

15. Traders Global may route some or all of these customers’ orders to an off-exchange leveraged forex and commodities dealer outside the U.S. called CDO Markets Ltd. (“CDO Markets”). (Ex. D, Chichester Test. at 78:13 through 79:4.) Traders Global refers to this as “STP’ing” a customer’s account; “STP” stands for “straight-through processing.” (*Id.* at 78:13 through 79:4, 98:15 though 99:17.)

16. The files produced by iS Risk reflect that less than 100 of the over 24,000 customers were ever assigned to an “STP” profile for even a single trade. I determined this by analyzing the data contained in the “customer daily trade

statements” and “customer trade” files. In order to conduct this analysis, I wrote a computer program that parsed the customer daily trade statements to determine each customer’s account number(s) and then parsed the customer trade files to determine which customers were assigned to an STP profile, then accurately summed the total number of such customers.

17. The customer trade files reflect that customers on STP did substantially worse than when they were trading against Traders Global. More than 70% of those customers made less money or went from being profitable to unprofitable after being switched to STP. I determined this by analyzing the data contained in the “customer daily trade statements” and “customer trade files”. In order to conduct this analysis, I wrote a computer program that parsed the customer daily trade statements to determine each customer’s account number(s); parsed the customer trade files to determine which customers’ account(s) had their orders STP’d, and when; and then compared the aggregate trading profit/loss for each customer before and after each customer was STP’d to reach an accurate comparison between the customers’ trading profit before and after being assigned to an STP profile.

18. The customer trades files reflect that STP’d customers were still subject to drawdown limits imposed by Traders Global. When a customer violates the drawdown limit, the “Comment” field in the relevant customer trades file includes some variation of the word “Breach.” Chichester explained in testimony that this is indicative of a Traders Global customer’s account equity exceeding the

drawdown limit. (Ex. D, Chichester Test. 168:13 through 169:8, 193:24 through 194:8.)

19. The files produced by iS Risk reflect customers on STP were charged an undisclosed markup on their trade prices when executing against CDO Markets. When a customer on STP executes a trade, two trade entries are generated: one between the customer and Traders Global, and one between Traders Global and the third-party liquidity provider. The undisclosed markup consists of the absolute difference between the “open price” in the first entry and the second entry combined with the absolute difference between the “close price” in the first entry and the second entry.

IV. BANK ACCOUNTS

A. THE TD BANK ACCOUNTS

20. I reviewed bank documents obtained by the Division via subpoena from TD Bank, N.A. (“TD”) for bank accounts in the name of Kazmi and TGG. The documents included account opening documents, bank statements, correspondence, and certain supporting documentation such as checks and deposit slips.

1. The Kazmi #2351 Account

21. The TD documents include records relating to a personal checking account in the name of Murtuza Kazmi (the “Kazmi #2351 account”). The documents for the Kazmi #2351 account are voluminous and cannot be conveniently examined in court. During the Relevant Period in this case, November 1, 2021, through the present, there are hundreds of pages of documents, including over 80

pages of statements. Accordingly, I used a computer program to convert the documents into spreadsheets, from which I produced accurate summaries of those bank records.

22. The following summary reflects the activity in the Kazmi #2351 account from the start of the Relevant Period through December 13, 2022, when TD closed Kazmi's account.

Category	Credits	Debits
All About Business Ltd		\$ 82,864.00
AMEX Payments		\$ 1,234,357.25
CASH		\$ 2,000.00
CDO Markets	\$ 199,997.00	\$ 200,000.00
CitiCard Payments		\$ 3,238.41
Clts Technologies		\$ 5,000,000.00
Coinbase	\$ 322,899.17	\$ 4,125,000.00
Edward Jones		\$ 10,000,000.00
Gemini Trust Company		\$ 25,000.00
iS Risk		\$ 76,000.00
Metaquotes		\$ 104,010.00
Patel Law Office Deposit for 3 Brenner Court, Franklin NJ		\$ 100,000.00
Pershing Brokerage	\$ 10,105,009.50	\$ 10,000,000.00
Providence Abstract LLC		\$ 1,029,836.40
RM Auctions		\$ 1,603,125.00
Transfer to/from Traders Global Group 5186 Account	\$ 15,000,553.76	\$ 49,500,000.00
Transfer to/from Wajiha Kazmi	\$ 40.00	\$ 120,000.00
Uber	\$ 293.55	\$ 16,647.68
Woo Commerce	\$ 107,248,816.90	
(blank)	\$ 4,647.50	\$ 352,439.77
Transfer to/from Traders Global Group TD Canada Trust Account		\$ 10,000,000.00
Transfer to/from Traders Global Group BMO Account		\$ 24,227,768.31
Transfers to/from Murtuza Kazmi TD Canada Trust Account		\$ 23,200,000.00
Grand Total	\$ 132,882,257.38	\$ 141,002,286.82

2. The TGG #5186 Account

23. The TD documents include records relating to an account in the name of Traders Global Group, Inc. (the "TGG #5186 Account"). The documents for the

TGG #5186 account are voluminous and cannot be conveniently examined in court.

During the Relevant Period in this case, November 1, 2021, through the present, there are hundreds of pages of documents, including over 120 pages of statements.

Accordingly, I used a computer program to convert the documents into spreadsheets, from which I produced accurate summaries of those bank records.

24. The following summary reflects the activity in the TGG #5186 Account from the start of the Relevant Period through December 13, 2022, when TD Bank closed TGG's account.

Row Labels	Sum of Credit Amount	Sum of Debit Amount
Account Closing Cashier's Check		\$ 15,166,025
ACH Traders Global Refund	\$ 186	
American Express		\$ 259,063
Bank Fees		\$ 2,005
CDO Markets		\$ 400,000
Clts Technologies Ltd		\$ 1,000,000
Deel, Inc.	\$ 272	\$ 92,988,313
Gemini Trust Company		\$ 55,000
iS Risk Analytics		\$ 325,644
Metaquotes		\$ 104,067
RK Technologies		\$ 130,374
Transfer to/from TGG TD Canada Trust account		\$ 10,000,000
Transfer to/from 2351 Personal Checking	\$ 49,500,000	\$ 15,000,200
Transfer to/from External TGG account	\$ 200,000	
Transfer to/from Rizwan Kazmi		\$ 353,685
TransferWise	\$ 2,838	\$ 31,112
WooCommerce	\$ 84,536,521	
Word Press		\$ 106,250
Zendesk		\$ 102,435
(blank)	\$ 50,195	\$ 228,829
Grand Total	\$ 134,290,012	\$ 136,253,000

B. THE BMO ACCOUNTS

1. BMO Canada

25. I reviewed bank documents obtained by the Division from the Ontario Securities Commission for three bank accounts in the name of TGG at BMO Bank of Montreal (“BMO Canada”). The documents included account opening documents, bank statements, correspondence, and certain supporting documentation such as checks and deposit slips.

26. Based on my review of the BMO Canada documents, in December 2022, three bank accounts in the name of Traders Global Group, Inc. were opened at BMO Canada. Two of these accounts – the TGG #188 Account and TGG #921 Account – are U.S. dollar denominated; one account – the TGG #995 Account – is Canadian dollar denominated.

27. The documents for the TGG accounts at BMO Canada are voluminous and cannot be conveniently examined in court. From December 2022 (when the accounts were opened) through April 2023 (the most recent records provided to the Division) there are over 30 pages of documents, including over 20 pages of statements. Accordingly, I used a computer program to convert the documents into spreadsheets, from which I produced accurate summaries of those bank records.

28. The following summary reflects the combined activity in U.S. dollar-denominated accounts, i.e., the TGG #188 and TGG #921 accounts, for the period December 2022 through April 2023.

Category	Credits	Debits
1 year BMO CD	\$ 50,000,000.00	\$ 85,000,000.00
Bank Fees		\$ 267.65
Bank Interest	\$ 217,993.29	\$ 455.16
CDO Markets Ltd.		\$ 850,000.00
CLTS Technologies		\$ 10,000,000.00
Custom House UK		\$ 7,500,000.00
Deel, Inc.	\$ 260,055.38	\$ 4,510,662.81
FPMX Technologies		\$ 157,500.00
iS Risk Analytics		\$ 45,055.54
JDME Global Ltd.		\$ 1,893,090.48
MetaQuotes Ltd.		\$ 260,078.29
PTC Automotive		\$ 600,000.00
RK Technologies		\$ 168,391.00
RM Auctions		\$ 3,305,275.00
SKM Consulting Services		\$ 15,010.00
Transfer from BMO TGG #188	\$ 20,000,000.00	
Transfer from BMO TGG #921	\$ 6,000,000.00	
Transfer from TD Canada TGG Account #889	\$ 5,106,006.07	
Transfer from TD US Kazmi #2351 Account	\$ 24,227,750.31	
Transfer from TD US TGG Account #5186 (closing check)	\$ 15,166,024.91	
Transfer to Account #995 (gets converted to \$CAD)		\$ 23,305,420.89
Transfer to BMO TGG #188		\$ 6,000,000.00
Transfer to BMO TGG #921		\$ 20,000,000.00
Transfer to BMO TGG #995 Account		\$ 221,755.71
Transfer to/from BMO Harris	\$ 4,000,000.00	\$ 48,119,013.00
VistaJet		\$ 433,500.00
WOO Commerce	\$ 100,140,889.00	
ZenDesk, Inc.		\$ 118,464.76
(blank)	\$ -	\$ 1,472,137.35
Grand Total	\$ 225,118,718.96	\$ 213,976,077.64

29. The following summary reflects activity in the TGG #995 Account (the CAD-denominated account) for the period December 2022 through April 2023.

Category	Credits	Debits
KPMG LLP		\$ 50,782.20
McLaren Toronto		\$ 66,972.07
RM Auctions		\$ 609,094.93
Transfer from BMO TGG #188 Account	\$ 299,999.99	
Transfer from TD Canada TGG Acct # 942	\$ 232,950.86	
Transfer of \$20MM USD from Account #921	\$ 27,171,600.00	
Transfer of \$3.3MM USD from Account #188	\$ 4,500,000.00	
Transfer to unidentified Kazmi Account		\$ 31,550,000.00
(blank)	\$ 600,000.01	\$ 139,763.79
Grand Total	\$ 32,804,550.86	\$ 32,416,612.99

2. BMO US

30. I reviewed bank documents obtained by the Division via subpoena from BMO Harris Bank, N.A. (“BMO US”) for a bank account in the name of TGG. The documents consist of bank statements and wire advices.

31. Based on my review of the BMO US documents, in December 2022, a bank account in the name of Traders Global Group, Inc. (the TGG #0162 Account) was opened at BMO US.

32. The documents for the TGG account at BMO US are voluminous and cannot be conveniently examined in court. From December 2022 (when the account was opened) through May 2023 (the most recent records provided to the Division) there are over 30 pages of documents, including over 20 pages of statements. Accordingly, I used a computer program to convert the documents into spreadsheets, from which I produced accurate summaries of those bank records.

33. The following summary reflects the activity in the TGG #0162 Account for the period December 2022 through May 2023.

Category	Credits	Debits
Amex Payments		\$ 2,260,834.94
Bank Fees	\$ 0.34	\$ 0.03
Deel, Inc.	\$ 0.39	\$ 52,150,590.11
Transfer to/from BMO Canada TGG #188 account	\$ 47,999,960.00	
Transfer to/from BMO Canada TGG #921 account	\$ 15,000,000.00	\$ 4,000,000.00
TransferWise, Inc.		\$ 30,039.00
Woo Commerce, Inc.	\$ 2,038,494.52	\$ 1,356.80
WPVIP, Inc.		\$ 21,250.00
Grand Total	\$ 65,038,455.25	\$ 58,464,070.88

V. THE DEEL ACCOUNT

34. DEEL is a payroll company that offers its clients the ability to make domestic and cross-border payments to employees and contractors. Per its website, TGG uses DEEL to make payments to successful customers from their so-called “trading profits.”

35. I reviewed documents obtained via subpoena from Deel, Inc., (“Deel”) for an account in the name of TGG. The documents included account opening documents, contracts, transaction spreadsheets, and correspondence.

36. Deel produced contracts entered into between TGG and its customers, which TGG characterizes as “paid contractors” or “traders.” The contracts are dated from the start of the Relevant Period through October 6, 2022 (the most recent record as of the date Deel made its production). Deel produced 16,138 such contracts. The contracts are too voluminous to be conveniently examined by the Court. In addition to the contracts themselves, Deel produced a spreadsheet (Deel_CFTC_00000061) listing customer contact and other information for each of the contracts. The spreadsheet is too voluminous to be conveniently examined by

the Court. The spreadsheet reflects that of the 16,138 such contracts, 15,664 of them belong to unique email addresses and thus, presumably, unique customers.

37. Deel produced invoices submitted by customers for payment of trading profits. The invoices are dated from the start of the Relevant Period through October 14, 2022 (the most recent record as of the date Deel made its production). Deel produced more than 40,000 such invoices. The invoices are too voluminous to be conveniently examined by the Court.

38. Deel produced a spreadsheet (Deel_CFTC_00424541) which reflects payments to persons who submitted invoices. The spreadsheet is too voluminous to be conveniently examined by the Court. The spreadsheet reflects that Deel made more than \$72 million in payments on behalf of TGG to “paid contractors” and “traders,” i.e., customers, between November 1, 2021, and October 14, 2022 (the most recent record as of the date Deel made its production).

VI. THE COINBASE ACCOUNTS

39. I reviewed documents obtained via subpoena from Coinbase, Inc., (“Coinbase”) relating to accounts in the names of Kazmi, TGG, or “My Forex Funds.” The documents included account opening documents, transaction spreadsheets, and correspondence.

A. COINBASE COMMERCE AKA THE “B95B” ACCOUNT

40. The documents produced by Coinbase reflect that Kazmi was the contact person for a Coinbase Commerce account. A Coinbase Commerce account is a service that allows the user to accept high-volume cryptocurrency payments from

other Coinbase users. Those payments are then forwarded to a cryptocurrency wallet of the user's choosing, in this case a non-custodial wallet designated by Kazmi (the "b95b" account).

41. Coinbase produced transaction records for Kazmi's Coinbase Commerce account. These records are voluminous and cannot be conveniently examined by a court. There are in excess of 87,000 transactions contained in a spreadsheet with over 87,000 rows and ten columns.

42. The transaction records reflect that from the start of the Relevant Period through November 3, 2022 (the most recent records obtained by the CFTC), Kazmi and Traders Global used Coinbase Commerce to accept approximately \$20,792,151.98 in cryptocurrency transfers from what appear to be TGG customers. These transfers are annotated with a description of the type of trading account being paid for by each customer, e.g., "1 x \$10,000 USD Account" or "1 x \$20,000 USD Account." The following is a representative snapshot from the transaction records:

USER_EMAIL	USER_ID	ORGANIZATION_NAME	CREATED_AT	DATE	DESCRIPTION	LOCAL_PRICE_CENTS	LOCAL_PRICE_USD
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-21T22:52:14.68275Z	2021-11-21	1 x \$50,000 USD Evaluation Standard	29900	299
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-21T22:55:01.424701Z	2021-11-21	1 x Evaluation Reset - Standard - \$100,000	44910	449.1
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-21T23:08:47.144566Z	2021-11-21	1 x \$10,000 USD Evaluation Standard	8400	84
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-21T23:21:09.24895Z	2021-11-21	1 x Fees - \$50,000 (Rapid)	31920	319.2
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-21T23:35:47.180108Z	2021-11-21	1 x Evaluation Reset - Standard - \$10,000	7560	75.6
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-21T23:47:00.769803Z	2021-11-21	1 x \$10,000 USD Evaluation Standard	8400	84
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-21T23:51:38.774072Z	2021-11-21	1 x \$100,000 USD Evaluation Standard	49900	499
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-22T01:02:54.902986Z	2021-11-22	1 x \$10,000 USD Evaluation Standard	8400	84
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-22T01:05:48.654496Z	2021-11-22	1 x Wallet Topup	7125	71.25
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-22T01:17:22.821499Z	2021-11-22	1 x Evaluation Reset - Standard - \$10,000	60	0.6
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-22T01:23:00.121618Z	2021-11-22	1 x \$100,000 USD Evaluation Standard	49900	499
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-22T01:28:56.715544Z	2021-11-22	1 x Wallet Topup	100	1
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-22T01:46:00.970463Z	2021-11-22	1 x Wallet Topup	200	2
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-22T02:09:31.954736Z	2021-11-22	1 x \$100,000 USD Evaluation Standard	47405	474.05
info@myforexfunds.com	21c94a69-529e-4224-a026-d39ee1b9b95b	My Forex Funds	2021-11-22T02:14:17.497788Z	2021-11-22	1 x \$10,000 USD Evaluation Standard	8400	84

43. During the Relevant Period, Kazmi's non-custodial cryptocurrency wallet received approximately \$3.62 million worth of cryptocurrency transactions that have no explanatory annotation and no source discernible from publicly-

available blockchain records.

B. 8DCF ACCOUNT

44. Coinbase also produced transaction records for a Coinbase account in the name of Kazmi (the “Coinbase #8dcf Account”). These records are voluminous and cannot be conveniently examined by a court. There are in excess of 16,000 transactions contained in a spreadsheet with ten columns.

45. The transaction records reflect that from the start of the Relevant Period through May 2022 (when the transactions cease), over \$9.4 million in digital assets was sent from the #8dcf account to unidentified recipients who were likely customers. The transfers were annotated with phrases such as “MFF – Rapid Payout” or “MFF - Accelerated Payout” and represent payments to MFF customers.

46. The following is a representative snapshot from the transaction records:

TIMESTAMP	Date	ACCOUNT	TYPE	BALANCE	AMOUNT	CURRENCY	TO	PRO TRANSFER	NOTES	EQUIV USD	TRANSACTION HASH
11/19/2021 23:25	2021-11-19	USDC Wallet	Send	14571.89	-1360.715951	USDC	0x40c987	Not a Pro Transfer	MFF Rapid Payout	-1360.71	c9701effb8e05ae0fec8f7
11/19/2021 23:28	2021-11-19	USDC Wallet	Send	13395	-1176.891122	USDC	0xc94D7	Not a Pro Transfer	MFF Rapid Payout	-1176.89	fabe99608f56f9b6c1a1b8
11/19/2021 20:51	2021-11-19	ETH Wallet	Send	2.185604	-0.22894945	ETH	0x77156E	Not a Pro Transfer	MFF Evaluation Payout	-981.66	e2d3856420ae5bb800f22
11/19/2021 21:45	2021-11-19	BTC Wallet	Send	0.824819	-0.01292099	BTC	38F8E0D	Not a Pro Transfer	MFF Accelerated Payout	-757.18	37dfdd882a0fde8a16664a
11/19/2021 21:04	2021-11-19	USDC Wallet	Send	18790.77	-735.434613	USDC	0x82C14	Not a Pro Transfer	MFF Accelerated Payout	-735.43	2f6a1bbe5c619773abac
11/19/2021 20:04	2021-11-19	USDC Wallet	Send	19578.83	-670.268424	USDC	0xa5A4A	Not a Pro Transfer	MFF Rapid Payout	-670.26	1f181408d15d9c8e4c5cd
11/19/2021 20:04	2021-11-19	BTC Wallet	Send	0.970097	-0.01096138	BTC	bc1qn05q	Not a Pro Transfer	MFF Accelerated Payout	-641.77	bf59a5fe183b1525c2ea7f
11/19/2021 21:49	2021-11-19	USDC Wallet	Send	17892.79	-544.333319	USDC	0x236151	Not a Pro Transfer	MFF Rapid Payout	-544.33	6c53040cf8094180a252e
11/19/2021 20:21	2021-11-19	USDC Wallet	Send	20249.1	-504.593204	USDC	0xbdd836	Not a Pro Transfer	MFF Rapid Payout	-504.59	2067cf69f9c9906af235a2
11/19/2021 19:17	2021-11-19	BTC Wallet	Send	0.982259	-0.00777411	BTC	32HVMh	Consumer to Pro	MFF Accelerated Payout	-457.3	
11/19/2021 23:51	2021-11-19	BTC Wallet	Send	0.694012	-0.00640417	BTC	11GkpGB	Not a Pro Transfer	MFF Evaluation Payout	-374.36	55cf52b22963f1afc9bd2b
11/19/2021 5:22	2021-11-19	BTC Wallet	Send	0.323159	-0.00653361	BTC	1AMvsgZ	Not a Pro Transfer	MFF - Evaluation Complete Payout	-373.68	bb52033a7060736a39611
11/19/2021 20:14	2021-11-19	BTC Wallet	Send	0.963908	-0.0061884	BTC	bc1q679j	Not a Pro Transfer	MFF Rapid Payout	-361.89	7546fb389d85d0307cea8
11/19/2021 21:19	2021-11-19	USDC Wallet	Send	18437.12	-353.645675	USDC	0x5E27d6	Not a Pro Transfer	MFF Rapid Payout	-353.64	29f2d0e0e6a529f4d8964
11/19/2021 21:23	2021-11-19	BTC Wallet	Send	0.899246	-0.00603206	BTC	1Fr8eVW	Not a Pro Transfer	MFF Accelerated Payout	-352.17	c0486137e94e39edee154
11/19/2021 18:10	2021-11-19	ETH Wallet	Send	3.480728	-0.07642718	ETH	0xc07854	Not a Pro Transfer	MFF Evaluation Bonus Phase 1	-330.85	447c3dbccad13e3ff40fe6
11/19/2021 18:20	2021-11-19	USDC Wallet	Send	21110.61	-330.63897	USDC	0xf97F51	Not a Pro Transfer	MFF Evaluation Bonus Phase 1	-330.63	ca8010013a55de08db36f
11/19/2021 18:22	2021-11-19	USDC Wallet	Send	20779.97	-330.63897	USDC	0xf97F51	Not a Pro Transfer	MFF Evaluation Bonus Phase 1	-330.63	31c1222d4d1c5dd6865e1
11/19/2021 23:18	2021-11-19	USDC Wallet	Send	15932.61	-327.703463	USDC	0xa29d25	Not a Pro Transfer	MFF Emphatic Payout	-327.7	6ced2730dc2b8dd21a41f

VII. SUMMARY STATISTICS RE FINANCIAL TRANSACTIONS

47. During the Relevant Period, the above-listed bank accounts in the names of Kazmi or TGG reflect a total \$290 million in payments from WooCommerce. WooCommerce is a credit card processor used by TGG to process

customer transactions. (Ex. C, Malinowski Decl. ¶¶ 6-7; Ex. C-2, MFF checkout source code and WordPress excerpts (showing WooCommerce “widget,” explaining function of widget).) These payments, in combination with approximately \$20 million in customer payments via the Coinbase Commerce account, reflect a total of approximately \$310 million in fees paid by customers.

48. During the same period, the above-listed bank accounts in the names of Kazmi or TGG reflect a total of approximately \$150 million in payments to DEEL. These payments, in combination with approximately \$9 million in payments from the Coinbase #8dcf Account bearing MFF-related annotations, reflect a total of approximately \$159 million paid to customers.

49. During the Relevant Period, TGG transferred \$14 million from its accounts in the U.S. to its accounts in Canada. During the same period, TGG transferred just under \$63 million from its accounts in Canada to its account in the U.S.

On this 24th day of August 2023, in Chicago, IL, I declare under the penalty of perjury that the foregoing is true and correct.

X 

Matthew S. Edelstein
Investigator